

COURT OF COMMON PLEAS OF MONROE COUNTY
FORTY-THIRD JUDICIAL DISTRICT
COMMONWEALTH OF PENNSYLVANIA

KRISTY LYNN ROGGIO,

Plaintiff

vs.

ROSS WILLIAM ROGGIO,

Defendant

NO. 9419 DR 2016

NO. 1272 CV 2016

IN DIVORCE

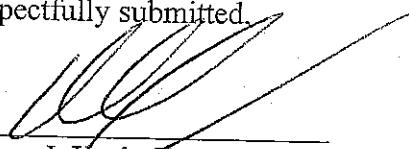
PROTHONOTARY
2017 JUL 28 PM 2 10
MONROE COUNTY, PA

REQUEST FOR EXPEDITED DISPOSITION PURSUANT TO
MONROE COUNTY LOCAL RULE 208.3(a)(5)

Jeffrey J. Kash, Esquire request expedited disposition of the attached motion, petition or appeal for the following reasons:

Respondent is seeking injunctive relief from the Bankruptcy Court. There is a hearing scheduled August 1, 2017.

Respectfully submitted,


Jeffrey J. Kash, Esq.
Attorney I.D. No. 52837
Attorney for Petitioner
Kash Fedrigo Belanger, LLC.
820 Ann Street
Stroudsburg, PA 18360
(570) 420-1004

A copy of this request has been provided to the following by the moving party:

Aaron M. DeAngelo
Newman Williams Mishkin Corveleyn
Wolfe & Fareri
PO BOX 511
Stroudsburg PA 18360-0511
Via regular mail

COPY

Case 5:17-bk-02119-MJC Doc 53-2 Filed 07/31/17 Entered 07/31/17 22:18:39 Desc
Exhibit July 28 2017 County Court filing in Violation of Stay Page 2 of 10

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PROTHONOTARY

MOTION FOR HEARING

AND NOW, comes Petitioner, Kristy Lynn Roggio, by and through her counsel, Jeffrey J. Kash, Esquire, who respectfully requests your Honorable Court schedule a hearing on Plaintiff's Petition for Contempt and for Special Relief, and presents the following in support thereof:

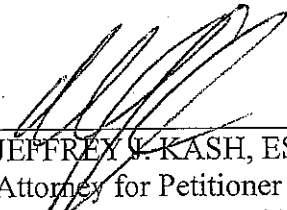
1. On May 2, 2017, the Petitioner filed a petition for contempt and for special relief.
2. On May 22, 2017, the Petitioner filed an amended petition for contempt and for special relief.
3. On July 5, 2017 the Honorable Jennifer Harlacher Sibum issued an Order staying Plaintiff's Petition for Contempt and for Special Relief filed May 12, 2017. A true and correct copy of said Order is attached hereto, incorporated by reference and marked exhibit "A".
4. On July 26, 2017, Bankruptcy Judge John J. Thomas entered an Order granting

relief from the automatic stay to proceed and enforce the terms of the domestic relations Agreement in the Court of Common Pleas of Monroe County without regard to the Automatic Stay. A true and correct copy of said Order is attached hereto, incorporated by reference and marked exhibit "B".

5. Defendant has been served with a true and correct copy of the foregoing Motion in accordance with Pennsylvania Rules of Civil Procedure.

WHEREFORE, Plaintiff, Kristy Lynn Roggio respectfully requests your Honorable Court schedule a hearing in this matter on Plaintiff's Petition and Amended Petition for Contempt and for Special Relief.

Respectfully submitted,



JEFFREY J. KASH, ESQ.
Attorney for Petitioner
Attorney I.D. No. 52837
Kash Fedrigon Belanger, LLC.
820 Ann Street
Stroudsburg, PA 18360
(570) 420-1004

Exhibit "A"

Exhibit "B"

COURT OF COMMON PLEAS OF MONROE COUNTY
FORTY-THIRD JUDICIAL DISTRICT
COMMONWEALTH OF PENNSYLVANIA

KRISTY LYNN ROGGIO,

Plaintiff

vs.

ROSS WILLIAM ROGGIO,

Defendant

: No. 9419 CV 2016

: No. 1272 DR 2016

: PLAINTIFF'S PETITION FOR
: CONTEMPT AND FOR
: SPECIAL RELIEF

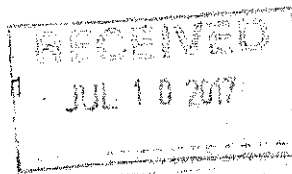
ORDER

AND NOW, this 5th day of July, 2017, the Defendant having filed a Suggestion of Bankruptcy, this matter, including the Plaintiff's Petition for Contempt and for Special Relief filed May 12, 2017, is stayed pending relief from the automatic stay being obtained from the United States Bankruptcy Court for the Middle District of Pennsylvania.

BY THE COURT:


JENNIFER HARLACHER SIBUM, J.

cc: Aaron M. DeAngelo, Esquire
Jeffrey J. Kash, Esquire



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MONROE COUNTY, PA

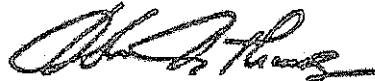
IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ROSS WILLIAM ROGGIO :
DEBTOR : NO.5:17-BK-02119-JJT
: :
: :
KRISTY LYNN ROGGIO, :
Movant :
: :
vs. : Motion for Relief
: :
ROSS WILLIAM ROGGIO, :
Respondent :
: :
: :
: :

ORDER

The Motion of Kristy Lynn Roggio is granted and she is granted relief from the automatic stay to proceed and enforce the terms of the domestic relations Agreement in the Court of Common Pleas of Monroe County without regard to the Automatic Stay.

By the Court,

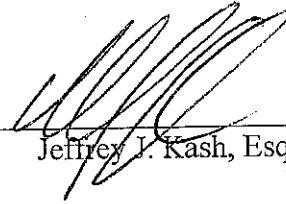


John J. Thomas, Bankruptcy Judge
(PJR)

Dated: July 26, 2017

VERIFICATION

I Jeffrey J. Kash, Esquire, hereby verify that the statements made herein are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'J. Kash', is written over a horizontal line.

Jeffrey J. Kash, Esquire

Date: July 28, 2017

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FORTY-THIRD JUDICIAL DISTRICT
COMMONWEALTH OF PENNSYLVANIA

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Plaintiff

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Defendant

NO. 9419 DR 2016

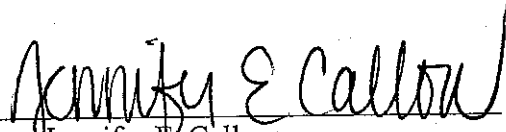
NO. 1272 CV 2016

IN DIVORCE

CERTIFICATE OF SERVICE

I, Jennifer E. Callow, Paralegal to Jeffrey J. Kash, Esquire, do hereby certify that on the 28th day of July 2017, I caused to be served a true and correct copy of a PROPOSED ORDER and MOTION FOR HEARING A upon the Defendant in the manner and addressed as follows:

Aaron M. DeAngelo
Newman Williams Mishkin Corveleyn
Wolfe & Fareri
PO BOX 511
Stroudsburg PA 18360-0511
Via regular mail


Jennifer E. Callow

Date: July 28, 2017